

ENTERED

December 19, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
Free Speech Systems LLC	§	Subchapter V
	§	
Debtor.	§	Case No. 22-60043 (cml)

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

In re:

**NEIL HESLIN, SCARLETT LEWIS,
LEONARD POZNER, VERONIQUE DE LA
ROSA, MARCEL FONTAINE,**

Plaintiffs,

v.

ADVERSARY NO. 22-06017

**ALEX E. JONES, FREE SPEECH
SYSTEMS, LLC, PQPR HOLDINGS
LIMITED, LLC, PLJR HOLDINGS, LLC,
PLJR HOLDINGS LIMITED, LLC, CAROL
JONES, DAVID JONES, AEJ HOLDINGS,
LLC AEJ TRUST 2019,**

Defendants.

DAVID WHEELER, FRANCINE
WHEELER, JACQUELINE BARDEN,
MARK BARDEN, NCOLE HOCKLEY, IAN
HOCKLEY, JENNIFER HENSEL, DONNA
SOTO, CARLEE SOTOPARISI, CARLOS
M. SOTO, JILLIAN SOTO, WILLIAM
SHERLACH, ROBERT PARKER,
WILLIAM ALDENBERG,

Intervenors.

JOINT-STIPULATION AND AGREED ORDER ABATING MOTION TO REMAND

Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (the “Texas Plaintiffs”), Intervenors David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto, William Sherlach, Robert Parker, and William Aldenberg (the “Intervenors”), Defendant Free Speech Systems, LLC, (“Defendant” and collectively with the Plaintiffs and the Intervenors, the “Parties”), present this *Joint-Stipulation and Agreed Order Abating Motion to Remand* (the “Stand-Still Agreement”) as follows.

WHEREAS, on April 6, 2022, the Texas Plaintiffs sued Alex Jones and the other Defendants under the Texas Uniform Fraudulent Transfer Act in state court (the “TUFTA Case”). The Intervenors later intervened in the TUFTA Case in June of 2022.

WHEREAS, on July 29, 2022, Free Speech Systems, LLC (“FSS”) petitioned for relief under chapter 11, subchapter V within the United States Bankruptcy Court for the Southern District of Texas.

WHEREAS, on October 27, 2022, Defendant removed the TUFTA Case from state court to this Court, with the alleged jurisdictional basis for the removal being the Court’s “related-to” jurisdiction.

WHEREAS, on November 28, 2022, the Texas Plaintiffs filed their *Motion for Abstention and Remand* (the “Remand Motion”). Subsequently, the Intervenor filed their joinder to the Remand Motion.

WHEREAS, in order to conserve the resources of the Parties and of the Court, and to ensure that the question of the Remand Motion is decided at the appropriate time, the Parties hereby agree to as follows.

NOW, THEREFORE, it is hereby **AGREED THAT**:

1. The time to file any papers in response to the Remand Motion is hereby adjourned until fifteen (15) days after the earlier of:

- a. Confirmation of FSS’s plan of reorganization;
- b. Conversion of FSS’s bankruptcy case to a liquidating proceeding under chapter 7;
- c. Dismissal of FSS’s bankruptcy case;
- d. A stipulation terminating the Stand-Still Agreement signed by the Parties;
or
- e. An order of the Bankruptcy Court terminating the Stand-Still Agreement for good cause shown.

2. This Stand-Still Agreement is subject to Bankruptcy Court approval. In the event the Bankruptcy Court denies approval of this Stand-Still Agreement, this Stand-Still Agreement shall be deemed null and void.

3. Nothing in this Stand-Still Agreement, or in the circumstances that gave rise to this Stand-Still Agreement, shall be construed as an acknowledgement by any Party to this Stipulation that any claim, pleading, responsive pleading, or otherwise, has or has not been barred, or is about to be barred by a statute of limitations, laches, or other defense based on the lapse of time.

4. This Stand-Still Agreement shall not operate as an admission of liability or acknowledgement of any defense by any Party. Neither this Stand-Still Agreement nor any action taken pursuant to this Stand-Still Agreement shall be offered or received in evidence in any action or proceeding as an admission of liability or acknowledgment of any defense by any Party to this Stand-Still Agreement.

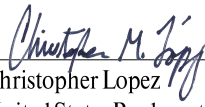
5. This Stand-Still Agreement comprises the entire agreement of the Parties with respect to the subject matter of this Stand-Still Agreement. This Stand-Still Agreement

may be modified, amended, or supplemented only by a written instrument signed by each of the Parties to this Stand-Still Agreement.

6. Each Party to this Stipulation represents, warrants, and states that all legal action necessary for the effectuation and execution of this Stipulation has been validly taken and that the individuals whose signatures appear below on behalf of each Party are duly authorized to execute this Stipulation on behalf of their respective Parties.

7. The Bankruptcy Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stand-Still Agreement, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stand-Still Agreement.

Signed: December 19, 2022


Christopher Lopez
United States Bankruptcy Judge

Agreed as to form and substance

Dated: November 28, 2022

/s/ Raymond W. Battaglia
Raymond W. Battaglia (TX State Bar # 01918055)
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Counsel for Free Speech Systems, LLC

/s/ Jarrod B. Martin
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**Counsel for Neil Heslin, Scarlett Lewis, Leonard Pozner,
Veronique De La Rosa, and Marcel Fontaine**

/s/ Ryan E. Chapple

Ryan E. Chapple (TX State Bar # 24036354)

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Jacqueline Barden, Mark Barden, Nicole Hockley,
Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi,
Carlos M. Soto, Jillian Soto-Marino, William Aldenberg,
William Sherlach, and Robert Parker*

United States Bankruptcy Court
Southern District of Texas

Heslin,
Plaintiff
Jones,
Defendant

Adv. Proc. No. 22-03331-cml

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Dec 20, 2022

User: ADIuser
Form ID: pdf002

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Total Noticed: 9

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 22, 2022:

Recip ID	Recipient Name and Address
aty	+ Raymond W. Battaglia, Law Offices of Ray Battaglia, PLLC, 66 Granburg Circle, San Antonio, TX 78218-3010
aty	+ Ryan Eric Chapple, Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-4653
aty	+ Stephen A. Roberts, Stephen A Roberts, P.C., 1400 Marshall Ln, Austin, TX 78703-3407
pla	+ Francine Wheeler, Cain & Skarnulis PLLC, Ryan E. Chapple, 303 Colorado Street,, Suite 2850 Austin, TX 78701-4653
pla	+ Leonard Pozner, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
pla	+ Marcel Fontaine, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin, Suite 2700 Houston, TX 77002-6774
pla	+ Neil Heslin, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
pla	+ Scarlett Lewis, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
pla	+ Veronique De La Rosa, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774

TOTAL: 9

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
dft		AEJ HOLDINGS, LLC, Austin, TX
dft		AEJ TRUST 2018, Austin, TX
dft		Alex E. Jones
pla		CARLEE SOTOPARISI
pla		CARLOS M. SOTO
dft		CAROL JONES, Austin, TX
dft		DAVID JONES
pla		DAVID WHEELER
pla		DONNA SOTO
dft		Free Speech Systems, LLC
pla		IAN HOCKLEY
pla		JACQUELINE BARDEN
pla		JENNIFER HENSEL
pla		JILLIAN SOTO
pla		MARK BARDEN
pla		NICOLE HOCKLEY
dft		PLJR HOLDINGS LIMITED, LLC, Austin, TX
dft		PLJR HOLDINGS, LLC, Austin, TX
dft		PQPR HOLDINGS LIMITED, LLC
pla		ROBERT PARKER
pla		WILLIAM ALDENBERG
pla		WILLIAM SHERLACH

TOTAL: 22 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

District/off: 0541-4
Date Rcvd: Dec 20, 2022

User: ADIuser
Form ID: pdf002

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Total Noticed: 9

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 22, 2022

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 19, 2022 at the address(es) listed below:

Name	Email Address
Avi Moshenberg	on behalf of Plaintiff Leonard Pozner avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Veronique De La Rosa avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Scarlett Lewis avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Neil Heslin avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Avi Moshenberg	on behalf of Plaintiff Marcel Fontaine avi.moshenberg@mhllp.com patricia.flores@mhllp.com
Federico Andino Reynal	on behalf of Defendant AEJ TRUST 2018 areynal@frlaw.us
Federico Andino Reynal	on behalf of Defendant Free Speech Systems LLC areynal@frlaw.us
Federico Andino Reynal	on behalf of Defendant Alex E. Jones areynal@frlaw.us
Federico Andino Reynal	on behalf of Defendant AEJ HOLDINGS LLC areynal@frlaw.us
Jarrold B. Martin	on behalf of Plaintiff Neil Heslin jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Marcel Fontaine jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Veronique De La Rosa jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Leonard Pozner jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Jarrold B. Martin	on behalf of Plaintiff Scarlett Lewis jarrod.martin@chamberlainlaw.com Lara.Coleman@chamberlainlaw.com;atty_jmartin@bluestylus.com;ginger.davis@chamberlainlaw.com
Stephen Wayne Lemmon	on behalf of Defendant PLJR HOLDINGS LIMITED LLC lemmon@slolp.com, mates@slolp.com
Stephen Wayne Lemmon	on behalf of Defendant PLJR HOLDINGS LLC lemmon@slolp.com, mates@slolp.com
Stephen Wayne Lemmon	

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on behalf of Defendant PQPR HOLDINGS LIMITED LLC lemmon@slolp.com, mates@slolp.com

TOTAL: 17